

EXHIBIT 32

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:

The County of Cuyahoga v. Purdue Pharma, L.P.  
et al., Case No. 18-OP-45090

City of Cleveland, Ohio v. Purdue Pharma L.P.,  
et al., Case No. 18-OP-45132

The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al., Case No. 17-OP-45004

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Videotaped Deposition of
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February 5, 2019
9:20 a.m.

Taken at:
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1 Q. And you yourself researched and
2 launched Project DAWN to combat the opioid
3 overdoses you were seeing in the emergency
4 room, correct?

5 A. Yes, that's right. That happened
6 in 2013.

7 Q. So why in 2015 was it still a
8 growing concern for you and your colleagues?

9 MS. SCOLNICK: Objection to the
10 form.

11 Q. Was it a full-blown concern by
12 then?

13 A. I think the concern began even
14 earlier. It began in the beginning of the
15 2000s and the mid-1990s. It has continued to
16 grow over time. That wasn't a plateau. It
17 wasn't the beginning. It wasn't the end. It
18 was a growing concern.

19 Q. Got it. So growing in terms of the
20 trajectory of it?

21 A. Correct.

22 Q. Okay. So the magnitude, not the
23 existence?

24 A. Not the existence, but, yes, the
25 magnitude.